

United States Department of Agriculture
Animal and Plant Health Inspection Service

WS Directive

2.401 02/17/04

PESTICIDE USE

1. PURPOSE

To provide guidelines for storage, disposal, recordkeeping requirements, and the safe and effective use of pesticides in the WS program.

2. REPLACEMENT HIGHLIGHTS

This directive revises WS Directive 2.401 dated 3/26/93.

3. POLICY

WS activities must be in compliance with all Federal, State, and local laws and regulations pertaining to pesticide applications, including certification requirements before using, transporting, shipping, disposing, supervising, or recommending the use of restricted use pesticides. Pesticides used or recommended by WS personnel must be registered by the U.S. Environmental Protection Agency (EPA) and the appropriate State regulatory agency.

WS personnel have responsibility for all aspects of control operations involving WS restricted use pesticides having label language which specifies "for use only by USDA personnel... or persons under their direct supervision." While non-WS persons may be involved in various phases of operations using these pesticides, the actual application will be conducted only by WS certified applicators. Furthermore, pesticides displaying WS restriction-specific labels, and all derived chemical products, will not be transferred or otherwise released to non-WS personnel. This restriction does not preclude or limit reimbursement to WS for any cost of materials or services provided by WS involving these pesticides.

Pesticide use, storage, and disposal will conform to label instructions and other applicable regulations and laws. Before using any pesticide, WS personnel will be trained in its proper and safe use.

WS personnel will not conduct operational activities on private property where other persons are known to be using the same or a similar pesticide(s) intended for control of the same target species. WS equipment, materials, and warning signs will be promptly removed from the area if such use is discovered. WS will notify the property owner or manager of this action.

Material Safety Data Sheets (MSDS) and labels for each pesticide

used by WS must be provided to all WS personnel and other potential users.

Pesticides must be stored in a locked or secured box, building, or vehicle when not in use. Warning signs or symbols required by Federal, State, and local laws and regulations must be displayed in the appropriate locations. Pesticides must be used in accordance with the Wildlife Services Standards for Storing Pesticides (See Attachment 1).

All unusable pesticides and by-products will be handled in a manner prescribed by the State Director (SD) and in accordance with EPA procedures. SD's are responsible for establishing proper accounting, monitoring, and recordkeeping procedures for all pesticides used in their program.

4. RECORDKEEPING REQUIREMENTS

Minimum recordkeeping for federally registered restricted use pesticides require that the following information must be recorded within 30 days following the pesticide application and be kept on file for at least 2 years [Note: State pesticide regulatory agencies may require additional recordkeeping and enforce longer retention dates]:

- a. The brand or product name, and the EPA registration number of the restricted use pesticide that was applied;
- b. The total amount of the restricted use pesticide applied;
- c. The location of the application, the size of the area treated, and the crop, commodity, stored product, or site to which a restricted use pesticide was applied;
- d. The month, day, and year when the restricted use pesticide application occurred; and,
- e. The name and certification number of the certified applicator who applied or who supervised the application of the restricted use pesticide.

An inventory record will be maintained for pesticides utilizing the Control Materials Inventory Tracking System (CMITS). Records will be evaluated by Headquarters staff and with periodic spot checks by a designated official.

Any toxic or adverse human effect which occurs to WS personnel, cooperators, or public involving the use, storage, or disposal of any pesticide registered by USDA, APHIS is to be immediately reported to the SD and Director. The Director will report the incident and submit specifics to the Director of Environmental Services, APHIS, as appropriate. An adverse human effect is defined by EPA as an incident in which a person suffers an adverse physiological or behavioral effect (other than local damage to or irritation of the skin or eye of the type commonly

associated with dermal or ocular exposure when the label provides adequate notice of such a hazard).

Additionally, WS personnel are required to report any knowledge of adverse incidents involving APHIS registered products. An adverse incident has occurred if a person or nontarget organism is exposed to and/or has an adverse effect from a pesticide.

5. REFERENCES

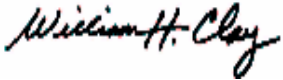
Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 et seq.), as amended.

Food, Agriculture, Conservation, and Trade Act of 1990 (FACT Act).

National Environmental Policy Act (Public Law 91-190, 42 U.S.C 4321 et seq.).

40 CFR Part 153.75 - Toxic or Adverse Effect Incident Reports, (a)(1)(i) through (iii).

Federal Register Vol. 58, No. 67 p. 19014.

A handwritten signature in black ink, reading "William H. Clay". The signature is written in a cursive, flowing style.

Deputy Administrator

**STANDARD FOR STORING PESTICIDES
WILDLIFE SERVICES**

INTRODUCTION

The purpose of this Standard is to provide for the safe storage of pesticides, identify appropriate waste disposal methods, provide a safe worksite for employees, and to appropriately define a pesticide inventory and its contents.

DEFINITIONS

The following definitions are used in this Standard. It is important to know these definitions to understand applicability and scope of this Standard.

Material Safety Data Sheet (MSDS). A document that describes the pesticide content and specifications, hazardous properties, disposal, and safety information.

Pesticide Container. Any drum, bag, bottle, pressurized container, or other closed vessel containing a pesticide.

Pesticide Inventory. A pesticide inventory is a written record containing the following information for each pesticides being stored, regardless of quantity:

- Name of pesticide,
- EPA registration number,
- Quantity transferred, used, disposed of, and
- Beginning and ending balance.

Pesticide Storage Cabinet/Box. A WS-approved storage cabinet or box for the sole purpose of storing pesticide containers.

Pesticide Storage Site. A site approved by WS for overnight storage of general and restricted use pesticides.

Ready Supply. A quantity of pesticide sufficient to complete a project, concurrent projects, or to conduct up to a week of work. However, when an employee is required to travel an extensive distance to pickup the pesticide from a central storage/distribution facility, or when there are other extenuating circumstances, the supervisor can extend the ready supply rule to a longer period.

Restricted-Use Pesticide. Pesticides classified for restricted use under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) in 40 CFR, Part 152.175.

Secondary Containment. Any container or device that prevents a

release of pesticide material into the environment when the primary container fails.

Worksite. For the purpose of these guidelines, a worksite is defined as an office, warehouse, residence or other ground location where employees are assigned to base their work from. Restrictions on pesticide storage at residential sites apply (See **Residential Storage Sites** below).

GENERAL STORAGE REQUIREMENTS

The following requirements are of a general nature and apply to all pesticide storage sites. All pesticides must be stored:

- In full compliance with State and EPA pesticide label requirements.
- In closed containers, at WS-approved worksites.
- So that only employees approved by the State Director, Field Station Leader, or their designee, will have access to pesticides.
- Separate from food and personal contact items such as clothing, linens, furniture, animal feeds, and animal health products.
- To minimize contact with moisture, excessive heat, or freeze/thaw cycles. (These conditions can affect the container integrity and product stability.)
- In secondary containment to contain pesticide spills into the environment. Examples of secondary containment for liquids include polyethylene-lined tubs, dikes, curbing, and double-walled tanks. The pesticide cabinet will provide secondary containment for nonliquids in a pesticide storage cabinet/box and/or in a central storage/distribution facility.
- To prevent theft. Unattended pesticides must be locked at all times to prevent theft or unauthorized use. Pesticides must not be left in motel rooms or other unsecured locations.
Immediately notify the supervisor if a theft or loss occurs.
- With an up-to-date (current) pesticide inventory available, to emergency responders, auditors, and other authorized persons.
- In a manner to segregate any incompatible pesticides.
- In each office or warehouse where pesticides are stored will have an up to date Occupant Emergency Plan (GSA Form 3415)

Banned or unapproved pesticides will not be used or stored at any WS facility. Refer to the section Waste Disposal for appropriate disposal procedures.

Pesticide Containers. All pesticide containers will be:

- Properly labeled (legible FIFRA label on the outside of the container) and labels must not be removed from original container.
- Free from rust and leaks.

- Appropriately stored in a pesticide cabinet/box and/or at a central storage/distribution facility.

Pesticide Cabinets and Boxes. The WS-approved pesticide cabinets and boxes must be:

- Made of metal, hard high-density plastic, or of another non-combustible material of substantial construction to minimize the risk of a break-in.
- Fire and weather resistant with sturdy hinges, locks, and hasps.
- Clearly labeled to depict the hazard, e.g., "Danger - Poison" with a skull and cross bones.
- Stored where adequate fire extinguisher and spill containment (if applicable) and collection materials will be readily available.
- Dedicated to pesticide storage only.

Central Storage/Distribution Facilities. These facilities are generally located at State, district, or field offices, and/or affiliated warehouse buildings. Access to pesticides should be limited to one or two designated persons who are responsible for distribution, inventory and recordkeeping, and disposal under FIFRA, and when applicable, under the Resource Conservation and Recovery Act (RCRA). The following requirements apply:

- Storage will be in a locked pesticide storage cabinet constructed of noncombustible materials or a dedicated room appropriately ventilated.
- Smoking is prohibited in all storage areas containing pesticides and "No Smoking" signs will be conspicuously posted at all entrances to storage areas.
- A fire extinguisher and spill kit (if applicable) must be located within 30 feet of storage area.
- If pesticide transfer operations will be performed, e.g., from one container to another container, personal protective equipment and the availability of an emergency eyewash system (permanent or portable) or a shower should be considered, dependent on the nature of the potential exposure.
- The most recent pesticide inventory, Material Safety Data Sheets (MSDS), and emergency response information or contact phone numbers will be maintained and readily available on-site.

Residential Storage Sites. When it is necessary for authorized employees to store small quantities of pesticides at their residences, the storage area at a residential location is classified as a worksite, and all the aforementioned general storage, pesticide container, pesticide cabinet, and inventory requirements apply. In addition, the following will apply:

- Storage and storage area must be authorized by the State Director in writing.
- Storage will be inside an approved, locked pesticide storage cabinet or box.

- Pesticides must be inaccessible to family members and visitors at all times.
- Pesticides will not be stored inside of residences. An attached garage is not considered inside the residence.
- If an employee's residence is located at a community dwelling, e.g., apartment complex, condominium, etc., an approved alternative site must be obtained.

TRANSPORTATION OF PESTICIDES AND OVERNIGHT STORAGE IN A VEHICLE

A "ready supply" of pesticides may be transported and/or stored overnight onboard government-owned vehicles or personal vehicles authorized for official use by the State Director. The following will apply:

- Pesticides must be in an approved, locked storage box kept inside the vehicle, or in a locked storage box kept in a substantial locked tool box (or equivalent) which is permanently attached to the vehicle except for large quantities of bagged grain baits. Large quantities of bagged grain baits may be transported outside a pesticide storage box, but may not be left unattended. Overnight storage of bagged grain bait must be in an approved pesticide storage cabinet/box, as necessary. Bagged grain baits can be temporarily stored in a vehicle as long as the truck bed or trailer is enclosed and locked, and the baits are covered to protect them from public view.
- The vehicle must be locked when unattended.
- Highly toxic or inhalation hazard pesticides, e.g., aluminum phosphide will not be carried or stored in the passenger compartment of a vehicle.
- Pesticide labels and Material Safety Data Sheets (MSDSs) will be transported with pesticides at all times.

If an employee's residence is located at a community dwelling, e.g., apartment complex, condominium, etc., an approved alternative storage site must be identified.

TRAINING

Facilities storing pesticides will have a required training program for all employees who handle pesticides. The training will be based on the review of current MSDS(s), labels, and other available information. Training must include storage requirements, personal protective equipment, emergency procedures including appropriate notification, and proper waste disposal.

A Hazard Communication Program will be implemented and maintained for each pesticide storage worksite. (Refer to APHIS Safety and Health Manual, Chapter 10, Section 8, Hazard Communication and OSHA regulation 29 CFR 1910.1200, Hazard Communication.)

INSPECTIONS

Inspections using the APHIS Safety Inspection Checklist, APHIS Form 256-5, are required a minimum of twice annually at all central storage/ distribution facilities where pesticides are stored. For overnight residential and vehicle storage sites, a less time-consuming and easily performed self-inspection checklist is authorized (Enclosure 1). Employees who conduct self-inspections at vehicle storage and residential sites (two/year minimum) will forward the inspection reports to the State Director/Field Station leader and retain copies for their files.

The State Director/Field Station Leader will verify the accuracy of the self-inspection checklists and APHIS Safety Inspection Checklists (APHIS Form 256-5) and take appropriate action to correct deficiencies.

EMERGENCY PROCEDURES

Facilities storing pesticides will have adequate emergency response procedures to include emergency evacuation plans, emergency contact phone numbers, and adequate emergency equipment such as fire extinguishers, spill kits, and personal protective equipment as needed. Actions and appropriate notifications must be consistent with the pesticide stored and the hazard potential. Additional information can be obtained from the APHIS Safety Health and Employee Wellness Branch by calling 301-734-5577.

The local fire department should be notified of pesticide materials stored at WS worksites, especially if there are no flammable or explosive materials are being stored at the site. Placement of appropriate NFPA red/blue/yellow (fire/health/reactivity) diamond signs should be utilized on storage cabinets or on the outside doors of storage buildings to identify potential hazards to the emergency response personnel. State and city ordinances may be more restrictive and may need to be followed.

WASTE DISPOSAL

Pesticide-contaminated materials must be disposed of or decontaminated in accordance with appropriate Federal, State, and local regulations as specified by the manufacturer's instructions. The Safety, Health, and Employee Wellness Branch (SHEWB) have established GSA Blanket Purchases Agreements with hazardous waste disposal firms for use by APHIS field offices. Contact SHEWB at 301-734-5577 to arrange a pickup and to request funding. Funding assistance may be available from the Environmental Protection Program Delivery account.

Enclosure 1

**Wildlife Service
Self-Inspection Checklist
Pesticide Storage Site**

Inspector _____ Telephone Number _____ Date _____

Residential Site Location _____, or

License Plate No. for Storage Vehicle _____; Government Vehicle ____ Private Vehicle ____

Pesticide Chemical Storage	YES	NO	N/A
1. Are pesticides stored in approved storage cabinets/boxes?			
2. Are storage cabinets and boxes kept locked?			
3. Are storage areas appropriately ventilated?			
4. Are provisions made for minimizing moisture absorption, overheating or freezing?			
5. Is an up-to-date pesticide inventory maintained at the site?			
6. Are pesticide containers labeled?			
7. Do written emergency procedures exist?			
8. Is personal protective equipment available?			
9. Is a fire extinguisher available (within 30 ft.)?			
10. Has the local fire department been provided the necessary information?			
11. Are MSDS's and pesticide labels available on location?			
12. Have you received training?			
13. Is a first aid kit available?			
14. Are a minimum of two inspections annually conducted on this site?			
15. Do pesticide storage and recordkeeping comply with State requirements?			
16. Are pesticides separate from food, personal contact items, and animal feed?			
17. Is applicator's certification up-to-date?			
18. Are pesticide storage cabinets and boxes in good condition?			
19. Has smoking been prohibited in pesticide storage areas and are signs posted?			
20. Is storage area located at a residence?			
21. Is storage area in a community dwelling, e.g., apartment, etc.?			
22. Are pesticides available to family members or visitors?			

I certify that the above-mentioned information is correct and valid.

Inspector's Signature

Date

State Director/Field Station Leader or Designee

Date

Please complete the above self-inspection checklist twice annually in January and July, and submit it to your State Director/Field Station Leader. Retain a copy for your files.